

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KONSTANTINOS APOSTOLOU,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No. 16-4812-NIQA
	:	
CITY OF PHILADELPHIA,	:	
	:	
Defendant.	:	

**PLAINTIFF KONSTANTINOS APOSTOLOU’S MEMORANDUM OF LAW IN SUPPORT
OF MOTION FOR LEAVE TO FILE SUR-REPLY REGARDING SGT. JAY MCLAIN’S
MOTION TO QUASH PLAINTIFF’S TRIAL SUBPOENA**

On July 3, 2019, Plaintiff filed his Response (DOC. 77) to Sgt. Jay McLain’s Motion to Quash Plaintiff’s Trial Subpoena (DOC 75).

Today, July 8th, Sgt. McLain filed a Reply (DOC. 78).

Plaintiff respectfully requests leave to file a Sur-Reply, as follows:

- (1) Within one day of an order granting such leave.
- (2) Not exceeding two double spaced pages (including the caption and signature pages).
- (3) Including solely one exhibit, relevant to when Sgt. McLain selected his vacation period for 2019.

RELIEF REQUESTED

The Court is respectfully requested to enter the attached proposed order granting leave to file a sur-reply.

Respectfully submitted,

s/Christopher D. Mannix
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July 8, 2019